

SCANNED

DMMT

Ronald Shamley,
4007 Beachcraft Court
Temple Hills, Maryland 20748

Plaintiff

v.

McDonalds Corporation,
8301 Baltimore Avenue
College Park, Maryland 20740

and

International Golden Food, LLC,
8996 Fern Park Drive
Burke, Virginia 22015

Defendant

* IN THE
* CIRCUIT COURT
* FOR
* Prince George's County

* CAL20-18354
* Case No.:

CLERK OF THE
CIRCUIT COURT
2020 OCT 30 AM 1:13
PR GEO CO MD #33

COMPLAINT

Plaintiff, Ronald Shamley, by and through his attorneys, Seigel and Rouhana, LLC and Paul N. Rouhana, files this action against the Defendants, McDonalds Corporation and International Golden Food, LLC, for that:

1. On or about January 28, 2018, the Plaintiff, Ronald Shamley, was lawfully operating her motor vehicle on the premises of McDonalds Corporation at 8301 Baltimore Avenue, College Parke, State of Maryland.
2. On that date and at that location, the Plaintiff, was arriving at the location to purchase breakfast when traveling through the parking lot he drove into an unmarked pothole.
3. As a direct and proximate result of the poor conditions of the parking lot and driving area on the property of the Defendant, as aforesaid, the Plaintiff was caused to suffer and sustain serious, painful, and permanent injury about the thoracic muscles.
4. The Plaintiff was rendered sick, sore, and disabled.


Case: CAL20-18354
NEW CASE
APP FEE PLAIN 10.00
CV CLERK FEE- 50.00
NO LEGAL SERV 55.00
RIF - NEW CAS 30.00
TOTAL 175.00
Rest PG15 Rct # 81400
Nov 02, 2020 Blk # 43 10:37 am

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5. The Plaintiff has incurred and will incur hospital, medical, and other expenses.
6. The Plaintiff has and will suffer physical and emotional pain and suffering.
7. The Plaintiff has lost and will lose time from her gainful employment and usual avocations.
8. The Plaintiff was otherwise injured and damaged.
9. No conduct on the part of the Plaintiff contributed to the accident or to the injuries sustained by her.

WHEREFORE, the Plaintiff, Ronald Shamley, demands judgment against the Defendants, McDonalds Corporation and International Golden Food, LLC, jointly and severally, in an amount in excess of \$75,000.00, plus interest and cost of this action.


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Counsel for Plaintiff

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Ronald Shamley,
4007 Beachcraft Court
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Plaintiff

v.

McDonalds Corporation,
8301 Baltimore Avenue
College Park, Maryland 20740

and

International Golden ~~Feed~~ Foods Food, LLC,
8996 Fern Park Drive
Burke, Virginia 22015

Defendants

* IN THE
* CIRCUIT COURT
* FOR
* Prince George's County
*
* Case No.: CAL20-18356
*
*

CLERK OF THE
CIRCUIT COURT
2020 DEC 16 PM 3:11
PR GEO CO MD #55

AMENDED COMPLAINT

Plaintiff, Ronald Shamley, by and through his attorneys, Seigel and Rouhana, LLC and Paul N. Rouhana, files this amended complaint against the Defendants, McDonalds Corporation and International Golden ~~Feed~~ Foods, LLC, for that:

1. On or about January 28, 2018, the Plaintiff, Ronald Shamley, was lawfully operating ~~her~~ his motor vehicle on the premises of McDonalds Corporation at 8301 Baltimore Avenue, College Parke, State of Maryland.
2. On that date and at that location, the Plaintiff, was arriving at the location to purchase breakfast and when traveling through the parking lot he drove into an unmarked pothole.
3. As a direct and proximate result of the poor conditions of the parking lot and driving area on the property of the Defendant, as aforesaid, the Plaintiff was caused to suffer and sustain serious, painful, and permanent injury about ~~the~~ his thoracic muscles.
4. The Plaintiff was rendered sick, sore, and disabled.

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5. The Plaintiff has incurred and will incur hospital, medical, and other expenses.
6. The Plaintiff has and will suffer physical and emotional pain and suffering.
7. The Plaintiff has lost and will lose time from ~~her~~ his gainful employment and usual avocations.
8. The Plaintiff was otherwise injured and damaged.
9. No conduct on the part of the Plaintiff contributed to the accident or to the injuries sustained by ~~her~~ him.

WHEREFORE, the Plaintiff, Ronald Shamley, demands judgment against the Defendants, McDonalds Corporation and International Golden ~~Feed~~ Foods, LLC, jointly and severally, in an amount in excess of \$75,000.00, plus interest and cost of this action.

/s/ Paul N. Rouhana
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